BEFORE THE POSTAL RATE COMMISSION WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION OF FIGE OF THE SECRETARY

Complaint on Sunday and Holiday Collections

DAVID B. POPKIN FOLLOW-UP INTERROGATORY TO THE UNITED STATES POSTAL SERVICE [DBP/USPS-18 - 19] AND POTENTIAL MOTION FOR LATE ACCEPTANCE

July 18, 2001

The following follow-up interrogatory is in response to the response made to DBP/USPS-8 filed on July 13, 2001. This motion is being mailed on July 18, 2001, and should arrive at the Commission on July 20, 2001, under current USPS standards. In the event that it does not arrive by the deadline, I move for late acceptance.

Respectfully submitted

July 18, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

DBP/USPS-18 In your response to DBP/USPS-8, you indicated that there was no national **policy** relating to the elimination or reduction of retail window service on days shortly before or after a holiday. I would now like to determine the extent to which offices **actually did reduce** or eliminate retail window service on days shortly before or after a holiday. [a] Refer to the Postal News release [contained in USPS-LR-C2001-1/4] dated December 19, 1996, which relates to service on December 24 in the Utah area and advise the extent to which offices were in the category of "smallest post offices" as opposed to which offices were in the category of "larger offices". [b] Refer to the Postal News release [contained in USPS-LR-C2001-1/4] dated December 20, 1999, which relates to service on December 24 in the Utah area and advise the extent to which offices were in the category of "small rural post offices". [c] Please advise whether any offices in the geographic area referred to in the Postal News releases referred to in subparts a and b [apparently the Salt Lake City District containing all

offices in the state of Utah] reduced or eliminated window service on Christmas eve in 1997, 1998, or 2000. [d] Please provide copies of any press releases relating to any positive response to subpart c. [e] Please explain why different policies were in effect for this district in different years. [f] Furnish copies of all documents relating to the decision to provide different levels of service for the different years. [g] Refer to Exhibit 3 in the original complaint filed by Mr. Carlson and advise which offices in the Southeast New England District reduced retail window service on Friday, December 24, 1999. [h] Provide a listing of any other offices that actually did reduce or eliminate retail window service on a day shortly before or after a holiday in the period of January 1, 1998 to date.

DBP/USPS-19 In your response to DBP/USPS-8, you indicated that there was no national policy relating to the elimination or reduction of retail window service on days shortly before or after a holiday. During the period of January 1, 1998 to date, provide all documents on any policy, guidance, or recommendations for deciding, or establishing criteria for deciding, the elimination or reduction of retail window service on days shortly before or after a holiday, that were issued by any of the eleven area offices. For any of the eleven areas that did not have such policy, guidance, or recommendation, provide the similar data for each of the districts contained in that area.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

July 18, 2001